

**EXHIBIT "B"**

**Exhibit to Notice of Supplemental Rule 30(b)(6) Deposition  
of Defendant Banc One Building Corporation – *Duces Tecum***

Deponent is requested to bring with it, the following documents:

1. All documents showing all payments of Banc One Building Corporation ("BOBC") to Forest Electric Corporation ("FEC"), for Banc One's Project #6B – General Lighting & Power Contract at CDC2 (hereinafter "the Project").
2. All documents showing all payments of Banc One Building Corporation ("BOBC") to Forest Electric Corporation ("FEC"), for the Banc One Project known as "RFP 21B – IT Conveyance Cable, Pod A (hereinafter "Pod A Project").
3. All documents showing all payments of Banc One Building Corporation ("BOBC") to Forest Electric Corporation ("FEC"), for the Banc One Project known as "RFP 21B – IT Conveyance Cable, Phase II (hereinafter "Phase II Project").
4. All documents reflecting the specific amounts and dates of payments, referred to in Items 1-3 above.
5. Any and all documents, including electronic documents, to or from BOBC or FEC, regarding FEC's withholding of payment to Creedon Controls, Inc. (hereinafter "CCI"), for the Project, Pod A Project, or Phase II Project.
6. All documents that reflect what BOBC or FEC or any other party contend is the proper form of waiver of liens or general release, which CCI is required to sign with respect to the Project, Pod A Project, and Phase II Project.
7. All documents BOBC contends support its contention that it is entitled to back-charges against CCI, with respect to the Project.
8. Any documents which refer to or support BOBC's contention that, on the Project, the actual electrical circuit layout did not match the submitted prints.
9. All documents that in any way support or refer to BOBC's contention that changes in circuit layout made by CCI, were not documented properly, and the building's lamping circuit's electrical phases were unbalanced.
10. Any and all time sheets showing the man hours claimed to be expended by BOBC or its sub-contractors, agents, or employees, to validate the circuits.
11. For the Phase II Project, all time sheets from Furness Electric that show any labor expended by Furness Electric, and for which BOBC contends it is entitled to a back-charge.

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Deposition of Defendant Banc One Building Corporation – *Duces Tecum***

12. All documents that refer to or support BOBC's contention that for the Pod A Project, any submitted drawings were wrong, or that defects were found between the submitted prints and as-found prints.

13. All documents that refer to or support BOBC's contention that a correction had to be made to balance the lamping circuits at panelboard ELC – 3, where Circuit No. 2 was moved to Circuit No. 12, or elsewhere, together with any document(s) supporting the amount of labor hours and costs thereof.

13. All documents that refer to or support BOBC's contention that, on the Pod A Project, all of the downstream lamps needed to be relabeled.

14. All documents that refer to or support BOBC's contention that it is entitled to back-charges or a set-off of \$15,052.52, as referred to and summarized in the letter of Charles Patrizia, Esquire to Edward Seglias, Esquire, and dated June 14, 2006.

RKB/msj  
06894-0001  
6/16/06